

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF TEXAS
LUBBOCK DIVISION

IN RE:

Reagor-Dykes Motors, LP, et al.

Debtors,

Dennis Faulkner, As Trustee of the Creditors
Trust,

Plaintiff,

vs.

Ford Motor Credit Company, LLC,

Defendant.

Case No. 18-50214-rlj-11
Jointly Administered

Adversary No. 20-05005-rlj

**CREDITORS' TRUSTEE DENNIS FAULKNER'S RESPONSE TO DEFENDANT
FORD MOTOR CREDIT COMPANY, LLC'S MOTION FOR STAY AND ORDER
STRIKING SCHEDULING ORDER DEADLINES OR, ALTERNATIVELY,
AN ORDER REOPENING DISCOVERY AND STRIKING
SCHEDULING ORDER DEADLINES**

Creditors' Trustee, Dennis Faulkner (the "Trustee"), files this response to the motion for stay and order striking scheduling order deadlines or, alternatively, an order reopening discovery and striking scheduling order deadlines and brief in support filed by Defendant Ford Motor Credit Company, LLC ("FMCC") [Dkts. 364 and 365]. The Trustee is filing a brief in opposition to FMCC's motion that provides each of the required matters under Local Bankruptcy Rule 7007-2.

WHEREFORE, the Trustee respectfully requests that the Court enter an order denying FMCC's motion for stay and order striking scheduling order deadlines or, alternatively, an order reopening discovery and striking scheduling order deadlines in its entirety.

Respectfully submitted,

BRACEWELL LLP

By: /s/ Bryan S. Dumesnil

Bryan S. Dumesnil
State Bar No. 00793650
bryan.dumesnil@bracewell.com
Bradley J. Benoit
State Bar No. 24012275
brad.benoit@bracewell.com
711 Louisiana, Suite 2300
Houston, Texas 77002
(713) 223-2300 – Telephone
(800) 404-3970 – Facsimile

STRICKLIN LAW FIRM, P.C.

By: /s/ Samuel M. Stricklin

Samuel M. Stricklin
State Bar No. 19397050
sam.stricklin@stricklaw.pro
2435 N. Central Expy
Suite 1200, Palisade, Bldg. II
Richardson, TX 75080
(972) 238-8687 – Telephone

**COUNSEL TO CREDITORS' TRUSTEE
DENNIS FAULKNER**

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing document has been forwarded to all counsel of record by email on November 14, 2022.

Kevin M. Sadler
State Bar No. 17512450
kevin.sadler@bakerbotts.com
BAKER BOTTS LLP
1001 Page Mill Road
Building One, Suite 200
Palo Alto, California 94304
(650) 739-7518 – Telephone
(650) 739-7618 – Facsimile

Michael S. Goldberg
State Bar No. 08075800
michael.goldberg@bakerbotts.com
BAKER BOTTS LLP
One Shell Plaza
910 Louisiana Street
Houston, TX 77002
(713) 229-1234 – Telephone
(713) 229-1522 – Facsimile

Craig A. Leslie
cleslie@phillipslytle.com
Jacob S. Sonner
jsonner@phillipslytle.com
PHILLIPS LYTLE LLP
One Canalside
125 Main Street
Buffalo, New York 14203
716-847-8400 – Telephone
716-852-6100 – Facsimile

/s/ Bryan S. Dumesnil
Bryan S. Dumesnil